

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

WELLPATH HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-90533 (ARP)

(Jointly Administered)

**DEBTORS' WITNESS AND EXHIBIT LIST
FOR HEARING ON NOVEMBER 18, 2024 AT 1:00 P.M.
(PREVAILING CENTRAL TIME)**

The Debtors in the above-styled cases (the "Cases") hereby file the following *Witness and Exhibit List* (this "Witness and Exhibit List") for the hearing (the "Hearing") scheduled for November 18, 2024, at 1:00 p.m. (Prevailing Central Time), before the Honorable Alfredo R. Pérez, United States Bankruptcy Judge, 515 Rusk Street, Courtroom 400, Houston, Texas 77002.

The Debtors designate the following witnesses and exhibits that may be offered at the Hearing.

WITNESSES

1. Christian Tempke, Managing Director, Lazard Frères & Co. LLC;
2. Jason Schoenholtz, Partner, MTS Health Partners, L.P.;
3. Any witness listed, offered, or called by any other party;
4. Any witness necessary to authenticate a document; and
5. Any witness required for rebuttal or impeachment.

¹ A complete list of the Debtors (as defined below) in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/Wellpath>. The Debtors' service address for these chapter 11 cases is 3340 Perimeter Hill Drive, Nashville, Tennessee 37211.

EXHIBITS

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	<i>Declaration of Christian Tempke in Support of Debtors' Emergency Motion for Entry of Orders (I)(A) Approving the Bidding Procedures for the Sale of the Debtors' Assets, (B) Approving Entry into a Stalking Horse Purchase Agreement for the Recovery Solutions Assets, (C) Authorizing the Recovery Solutions Expense Reimbursement, (D) Authorizing Potential Selection of Stalking Horse Bidders for the Corrections Assets and Approving Related Corrections Asset(s) Bid Protections, (E) Establishing Related Dates and Deadlines, (F) Approving the Form and Manner of Notice Thereof, and (G) Approving the Assumption and Assignment Procedures, (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Docket No. 21; Exhibit A].</i>				
2.	<i>Declaration of Jason Schoenholtz in Support of Debtors' Emergency Motion for Entry of Orders (I)(A) Approving the Bidding Procedures for the Sale of the Debtors' Assets, (B) Approving Entry into a Stalking Horse Purchase Agreement for the Recovery Solutions Assets, (C) Authorizing the Recovery Solutions Expense Reimbursement, (D) Authorizing Potential Selection of Stalking Horse Bidders for the Corrections Assets and Approving Related Corrections Asset(s) Bid Protections, (E) Establishing Related Dates and Deadlines, (F) Approving the Form and Manner of Notice Thereof, and (G) Approving the Assumption and Assignment Procedures, (II)(A) Approving the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Interests, and Encumbrances, (B) Authorizing the Assumption and Assignment of Executory Contracts and Unexpired Leases, and (III) Granting Related Relief [Docket No. 21; Exhibit B].</i>				
	Any pleading on file in these Cases				
	Any exhibits listed, designated, or offered by any other party				
	Any exhibits necessary for rebuttal				

RESERVATION OF RIGHTS

The Debtors reserve the right to modify, amend, or supplement this Witness and Exhibit List at any time prior to the Hearing. The Debtors reserve the right to ask the Court to take judicial notice of pleadings, orders, transcripts, and/or other documents filed in or in connection with these Cases, and to offer rebuttal exhibits. Designation of any exhibit above does not waive any objections the Debtors may have to any exhibit listed on any other party's exhibit list.

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Dated: November 15, 2024
Dallas, Texas

/s/ *Marcus A. Helt*

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Proposed Counsel for the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that on November 15, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Marcus A. Helt

Marcus A. Helt